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6 UNITED STATES BANKRUPTCY COURT
7 NORTHERN DISTRICT OF CALIFORNIA
8 SAN FRANCISCO DIVISION

9 IN RE:

Case No.: 24-30074 DM

10 LEGAL RECOVERY, LLC

Chapter 11

11 Debtor

SECOND AMENDED APPLICATION FOR
EMPLOYMENT OF ATTORNEY FOR
DEBTOR AND DEBTOR IN POSSESSION

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13 LEGAL RECOVERY, LLC, Debtor and Debtor in possession herein, respectfully represents:

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- 15 1. Debtor filed the petition herein on Feb. 6, 2024 and the amended petition on Feb. 20,
16 2024 electing to proceed under Subchapter V of Chapter 11.
 - 17 2. Debtor wishes to employ the Law Offices of Leeds Disston ("Attorney") on the fee
18 agreement attached as Exhibit A to the Declaration of Leeds Disston.
 - 19 3. Section 327(a) requires that professional persons seeking authorization to represent the
20 bankruptcy estate be disinterested and prohibits such professionals from representing any
21 interest adverse to the estate. Debtor represents that to its knowledge, the Attorney is
22 disinterested in the outcome of this case other than to represent the best interest of Debtor
23 in this case. Attorney has no connection with any other party with interest adverse to the
24 Debtor. Neither Attorney nor any member of his office has any interest adverse in this
25 case or in any of the matters upon which he is to be engaged. Neither Attorney nor any
26 member of his office is an insider, has or holds any interests in Debtor or its estates, is
27 related to Debtor in any way except as Debtor's attorney, and otherwise has no stake in
28 Debtor's assets or liabilities. Furthermore, neither Attorney nor any member of his staff
is related to Debtor or its members, except as Debtor's attorney, or to debtor's creditors,
their respective attorneys or accountants, or to the U.S. trustee, the trustee's staff or

1 members of its office, or any other party in interest. (Also see Disston Dec.) Debtor
2 believe Attorney's employment would be in the best interests of the Debtor and its estate.

- 3 4. Under Federal Rule of Bankruptcy Procedure 2014(a), an application to employ an estate
4 professional must include specific disclosures including any proposed arrangement for
5 compensation and disclosure of all connections with any party of interest. Debtor
6 represents that neither the Debtor nor any other party has paid the Attorney for work that
7 Attorney has performed in or related to this case. Other than the fee agreement attached
8 to Ex. A of Disston Dec., neither the Debtor nor any other person has entered into a fee
9 agreement with Attorney for work in or related to this case.
10 5. The debtor believes that Attorney is qualified to practice in this court for all matters
11 related to this case, and that Attorney will work for the best interest of Debtor.

12 WHEREFORE, Debtor pray that Debtor be authorized to employ Leeds Disston as attorney and
13 that Debtor have further relief as is just.

14 Dated: July 19, 2024

15 /s/Demas Yan

16 Responsible Individual
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